

Lab Committee – Report to BACWA Board

April 26, 2007

Prepared By: Rod Miller, Committee Chair

Committee Request for Board Action:

None

Business Discussed and Action Items:

Business	Action Item	Due Date
<p>CA DHS ELAP Important Notice: On Monday, March 12, 2007 the USEPA issued Guidelines for Establishing Test Procedures for the Analysis of Pollutants under the Clean Water Act; National Primary Drinking Water Regulations; Analysis and Sampling Procedures; Final Rule. This Rule becomes effective April 11, 2007 and will impact your certification and may require changes to your laboratory procedures as of that date.</p>	<p>In addition to holding time changes and method updates as noted on page 3, the following items are of note/concern for BACWA membership:</p> <ul style="list-style-type: none"> ➤ Exceptions based on NPDES Permits (or other regulatory mandates): The EPA Office of Water has allowed the continued use of the removed methods if they are specified in a permit, for the life of the permit. What this means is: <ul style="list-style-type: none"> • If your laboratory is performing analyses for an existing NPDES permit that specifies the analytical method or are under other regulatory requirements to use one of the outdated (removed) methods, you may continue to use these methods ONLY for those specific situations. • Any other use of the removed methods is prohibited. ➤ RWQCB specific requirements such as 6 hour holding time for BOD analyses versus MUR requirement of up to 48 hours, which requirement trumps the other? <p>The lab committee is compiling a list of discrepancies between the new MUR and historical RWQCB requirements and will prepare a BACWA letter to seek clarification on these inconsistencies.</p>	<p>End of May</p>
<p>The latest draft of CA DHS ELAP Laboratory Certification regulations (Chapter 19 in Title 22)- Draft Nov06 rev4</p>	<p>The lab committee membership is concerned about proposed changes for ELAP laboratory certification requirements contained in the draft revision, for example:</p> <ul style="list-style-type: none"> ➤ Proposed punitive fines for certain newly defined “violations” including: <ul style="list-style-type: none"> • Late payment of certification fees • Late submittal of application documents • Late submittal of corrective action documentation as specified inspection report 	

	<ul style="list-style-type: none"> • A laboratory cited for deficiencies from an on-site inspection may be fined for each deficiency up to the amount specified in Section 100880 of the Health and Safety Code. • Laboratory Director can be personally liable for certain fines <p>➤ Automatic suspension of a field of testing for a performance evaluation (PE) sample failure.</p> <p>➤ PE acceptance criteria: Each laboratory, certified or applying for certification for a Field of Testing involving wastewater chemistry, shall meet the acceptance limits at the 99% confidence level based on reference laboratory data.</p> <p>The BACWA lab committee will work with representatives of CWEA and ELTAC (Environmental Laboratory Technical Advisory Committee) to provide written comments on the proposed ELAP regulations.</p>	mid May
Order For Unfiltered Methylmercury Waste Discharge Data Pursuant to California Water Code Section 13267 letter	Lab workgroup is compiling a spreadsheet containing initial sample results of member POTW facilities for influent and effluent sample concentrations of methylmercury. This is simply a preliminary assessment to get an idea of the variability of results and concentration levels being observed. The lab committee will provide this information at a future Board meeting with non-specific facility identifications (e.g., Facility A, B, etc.) and the treatment type employed at each POTW.	Ongoing

Holding Time and Preservation Changes Table

- Change 4° C to 0-6° C
- Change HT for Cr+6 to 28 days with preservation
- Mercury (CVAFS): 5 mL/L 12N HCl or 5 mL/ L BrCl , 90 days
- Metals, except boron, chromium VI, and mercury: HNO₃ to pH<2 for 6 months, or HNO₃ to pH<2 at least 24 hours prior to analysis.
- HT starts at end of composite period
- Chlorine, total residual: Analyze within 15 minutes
- Hydrogen ion (pH): Analyze within 15 minutes
- Orthophosphate: Filter within 15 minutes; Analyze within 48 hours
- Oxygen, Dissolved Probe: Analyze within 15 minutes
- Sulfite: Analyze within 15 minutes

Source: <http://www.dhs.ca.gov/ps/ls/elap/pdf/HoldingTimePreservationChanges.pdf>

New Test Methods for CWA

- **EPA 200.2** Total Recoverable Elements Digestion (preparation procedure)
- **EPA 200.8** Metals by ICPMS (currently approved by USEPA Region 9 as an ATP)
- **EPA 200.9** Metals by STGFAA
- **EPA 218.6 SM 3500-Cr C (20th), SM3500-Cr- E (18th, 19th)**, Hexavalent Chromium by IC
- **EPA 245.7** Mercury by Cold Vapor Atomic Fluorescence Spectrometry,
- **EPA 300.0** Anions by IC (currently approved by USEPA Region 9 as an ATP)
- **EPA 300.1, SM 4110 B (18th, 19th, 20th)** Anions by IC
- **Revision to EPA 180.1(2)** Turbidity
- **Revision to EPA 200.7(4.4)** ICP-AES
- **Revision to EPA 245.1(3.0)** Mercury
- **Revision to EPA 335.4 (1.0)** Cyanide
- **Revision to EPA 350.1(2)** Ammonia
- **Revision to EPA 351.2(2)** TKN
- **Revision to EPA 353.2(2)** Nitrate-Nitrite
- **Revision to EPA 365.1(2)** Phosphorus
- **Revision to EPA 375.2 (2)** Sulfate
- **Revision to EPA 410.4(2)** COD
- **Revision to EPA 420.4(1)** Total Phenols
- **ASTM D512-89** Chloride by Ion Selective Electrode
- **ASTM D6508** Dissolved Inorganic Anions by Capillary Ion Electrophoresis
- **ASTM D6888-04** Available Cyanide by Ligand Exchange-FIA
- **ASTM D6919-03** Calcium, Magnesium, Sodium, Potassium and Ammonium by IC
- **Kelada-01** Automated Methods for Total Cyanide
- **QuikChem Method 10-204-00-1-X**, Cyanide using Micro distillation and FIA
- **SM 4500-Cl-D** Chloride by Potentiometry
- **SM 4500-Cl E** Chlorine by Low Level Amperometry
- **SM 4500-CN-F, ASTM D2036-98 A** Cyanide by Ion Selective Electrode
- **SM 4500-S2-G, ASTM D4658-03** Sulfide by Ion Selective Electrode
- **SM 4500-NO3-D** Nitrate by Ion Selective Electrode
- **Standard Methods Online**

Source: <http://www.dhs.ca.gov/ps/ls/elap/pdf/NewTestMethods.pdf>